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*Attorneys for Defendant  
Wells Fargo Bank, N.A. (also incorrectly  
named as Wells Fargo Home Mortgage)*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SHEILA K. STUPPY,

Plaintiff,

vs.

WELLS FARGO HOME MORTGAGE;  
WELLS FARGO BANK, N.A., CLEAR  
RECON CORP.;

Defendants.

CASE NO.: 2:16-cv-02954-JCM-PAL

**DEFENDANT WELLS FARGO  
BANK, N.A.'S EX PARTE  
MOTION TO EXTEND TIME TO  
RESPOND TO PLAINTIFF'S  
COMPLAINT**

**(Second Request)**

Pursuant to Federal Rule of Civil Procedure 7(b) and Local Rules 6-2 and 7-5(b) for the District of Nevada, Defendant Wells Fargo Bank, N.A., also incorrectly sued as Wells Fargo Home Mortgage ("Wells Fargo") respectfully submits this Ex Parte Motion to Extend Deadline to Respond to the Complaint filed by Plaintiff Sheila K. Stuppy ("Plaintiff"), which was removed to this Court on December 21, 2016 (the "Motion").<sup>1</sup>

Wells Fargo respectfully requests a second extension of time to respond to Plaintiff's Complaint, for fourteen (14) days, to February 2, 2017. In support of this Motion, Wells Fargo states as follows:

1. On or about December 2, 2016, Plaintiff commenced an action in the District

<sup>1</sup> The filing of this Motion does not waive any of Defendants' rights or remedies and the Defendants explicitly preserve all of their rights, claims and defenses.

1 Court of the State of Nevada, Clark County, styled *Stuppy v. Wells Fargo Home Mortgage, Wells*  
2 *Fargo Bank, N.A., Clear Recon Corp.* (Case No. A-16-747526-C).

3 2. On December 21, 2016, Wells Fargo removed the action to this Court.

4 3. In accordance with the prior order of this Court, Wells Fargo's Answer or other  
5 response is due on January 19, 2017 [Docket No. 5].

6 4. There are currently no scheduled hearings in this case. A short extension to file a  
7 response will not unduly delay the proceedings. There will be no adverse effect or prejudice to  
8 any of the parties if this Motion is granted.

9 5. Wells Fargo's counsel requires an additional brief extension to prepare its response  
10 due to the holidays and client coordination efforts.

11 6. Wells Fargo has made efforts to stipulate as to an extension of time. Plaintiff has  
12 filed this action pro se, and did not list a phone number or an email address on the case cover  
13 sheet of the original action. Counsel for Wells Fargo left a message for Plaintiff today, January  
14 17, 2017, regarding this requested extension. Additionally, Plaintiff has not responded to  
15 multiple phone messages and emails to Plaintiff from Wells Fargo since December 2016.

16 7. Furthermore, a Joint Status Report is due to the Court on January 20, 2017.  
17 Counsel for Wells Fargo mailed a proposed Joint Status Report to Plaintiff on January 13, 2017,  
18 but has not yet received a response.

19 9. Pursuant to LR 7-5(b), good cause exists as to why this Motion has been submitted  
20 to the Court without prior notice to Plaintiff. Wells Fargo attempted to discuss an extension with  
21 Plaintiff, but Wells Fargo does not have an email address or other known phone number for  
22 Plaintiff.

23 10. Wells Fargo has previously requested one extension of time from this Court.  
24  
25  
26  
27  
28

1 WHEREFORE, Wells Fargo respectfully requests that this Court enter an Order extending  
2 the time for its response to the Complaint for an additional fourteen (14) days, to February 2,  
3 2017.

4  
5 Dated: January 17, 2017

SNELL & WILMER L.L.P.

6  
7 By: /s/ Tanya N. Peters

8 Robin E. Perkins, Esq.

9 Tanya N. Peters, Esq.

3883 Howard Hughes Parkway, Suite 1100

Las Vegas, NV 89169

10 *Attorneys for Defendant Wells Fargo Bank, N.A.*

11 *(also incorrectly named as Wells Fargo Home*  
12 *Mortgage)*

13 **ORDER**

14 Based on the foregoing and for good cause, **IT IS ORDERED THAT** Wells Fargo's  
15 deadline to respond to Plaintiff's complaint is extended to February 2, 2017.

16  
17 **IT IS SO ORDERED.**

18   
19 MAGISTRATE JUDGE

20 DATED January 18, 2017.

Snell & Wilmer

L.L.P.  
LAW OFFICES  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, Nevada 89169  
702.784.5200

**CERTIFICATE OF SERVICE**

I hereby declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **DEFENDANT WELLS FARGO BANK, N.A.'s EX PARTE MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFF'S COMPLAINT** by the method indicated below:

<u>  X  </u>	U.S. Mail	<u>          </u>	Federal Express
<u>          </u>	U.S. Certified Mail	<u>          </u>	Electronic Service
<u>          </u>	Facsimile Transmission	<u>          </u>	Hand Delivery
<u>          </u>	Overnight Mail		

and addressed to the following:

Sheila K. Stuppy  
P.O. Box 750725  
Las Vegas, Nevada 89136

Plaintiff

DATED this 17<sup>th</sup> day of January, 2017.

/s/ Nissa Riley  
An Employee of Snell & Wilmer L.L.P.

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